



THE CITY OF NEW YORK
LAW DEPARTMENT

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May 29, 2014

BY ECF

Honorable Joan M. Azrack
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: A.A. by M/N/G Millette Myers v. City of New York et. al., 14 CV 00374
(ARR)(JMA)

Dear Magistrate Judge Azrack:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, representing defendant City of New York in the above-referenced matter. I write with the consent of Richard P. Reyes, Esq., to respectfully request 1) a three week enlargement of time from June 2, 2014 until June 23, 2014 within which the defendant City may answer or otherwise respond to the complaint; and 2) a thirty day adjournment of the June 9, 2014 initial conference until a later date and time convenient to the Court. This is the City's second such request for such an extension. The basis for this request is two-fold. First, plaintiff has not yet provided releases to defense counsel to access the records related to the incident described in the complaint. Therefore, defense counsel has been hampered in his ability to investigate plaintiff's claims, because as a student and minor, this Office is prohibited from accessing documents pertaining to this matter with the proper release. Plaintiff's counsel has stated he will check his file, but is now involved in a trial that unexpectedly proceeded this week. In addition, the one officer that has been served is away on vacation this week, and because defense counsel was out the country for the majority of the preceding two weeks, this office has been unable to discuss representation with her. She is expected to return to work next week, when defense counsel is expected to be on trial in the Southern District.

For these reasons, defendant request a further enlargement of the time to answer and an adjournment of the initial conference.

Thank you for your time and consideration.

Respectfully submitted,

/s/

Joshua J. Lax
Special Assistant Corporation Counsel

CC: Richard P. Reyes, Esq. (BY ECF)